

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VICTORIA EVANOFF, as Administrator) NO. 5:23-cv-03417-JFL
of the ESTATE OF JOHN EVANOFF,)
DECEASED)
)
- vs -)
)
MARSH USA, LLC,)
THERESE PERRETTE, and)
JOHN DOE DEFENDANTS # 1-2)
- - - - -

REMOTE DEPOSITION OF VICTORIA EVANOFF, held
via Zoom, taken by and before KRISTIN N. McCUSKER,
Registered Merit Reporter, Certified Realtime Reporter and
Notary Public, on Tuesday, January 23, 2024, commencing at
10:05 a.m.

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Page 2

1 APPEARANCES: (Zoom)

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Page 3

1 INDEX

2 WITNESS PAGE

3 VICTORIA EVANOFF

4 By: Mr. Luongo 4, 63

5 By: Ms. Weiss 62

6 EXHIBITS

7 NO. DESCRIPTION PAGE MARKED

8 Evanoff-1 Agreement For Compensation 64
9 For Death

10 Evanoff-2 GoFundMe Page 64

Page 4

1 (By agreement of counsel, the
2 sealing, filing, and certification
3 are waived; and all objections,
4 except as to the form of the
5 question, are reserved until the
6 time of trial.)

7 VICTORIA EVANOFF, after having
8 been duly sworn, was examined and
9 testified as follows:

10 BY MR. LUONGO:

11 Q. Good morning, Ms. Evanoff. My name
12 is Michael Luongo. I'm with the law firm
13 of Goldberg Segalla, and I represent
14 Defendants, Marsh USA and Therese Perrette
15 in this action.

16 First, we'll take breaks as needed.
17 So if you need to stop at any time, just
18 let me know and we'll try to accommodate
19 that.

20 Where are you currently located for
21 this deposition?

22 A. Like what room in my home?

Page 5

1 Q. Well, you said your home. So that's
2 what I'm trying to get at. Are you at your
3 home right now?

4 A. Yes.

5 Q. Is there anyone else present with
6 you?

7 A. I'm by myself.

8 Q. You're testifying under oath today.
9 Do you understand that your testimony has
10 the same effect as if we were in court?

11 A. Yes.

12 Q. I have a few instructions for you.
13 Please allow me to finish my question
14 before you begin your answer even if you
15 know where I'm going with my question.
16 That way it makes it easy for the court
17 reporter to transcribe everything that
18 we're saying. It becomes difficult if
19 we're talking over one another. Is that
20 understood?

21 A. Yes.

22 Q. Also please make sure to give me
23 verbal responses. Gestures won't come
24 through in a written transcript. Okay?

2 (Pages 2 to 5)

Page 6

1 A. Yes.
 2 Q. Also you are not required to guess
 3 or speculate at an answer. So if you don't
 4 know something, just let me know that. But
 5 if you are able to estimate, you can tell
 6 me that you are giving me an estimate.
 7 Understood?
 8 A. Yes.
 9 Q. If you don't understand any of my
 10 questions, please let me know. I will try
 11 to rephrase. But if you do respond to my
 12 question, I will assume that you understood
 13 it and are giving me your best answer.
 14 Okay?
 15 A. Yes.
 16 Q. Are you taking any medications that
 17 would affect your ability to testify today?
 18 A. No.
 19 Q. Can you please state your full name
 20 for the record?
 21 A. Victoria Lei Evanoff.
 22 Q. And your middle name, is that
 23 spelled L-E-I?
 24 A. Yes.

Page 7

1 Q. What is your date of birth?
 2 A. [REDACTED] 1993.
 3 Q. Do you have an e-mail address?
 4 A. Yes.
 5 Q. What e-mail address or addresses do
 6 you currently use?
 7 A. The only one that I access is
 8 v.evanoff93@gmail.com.
 9 Q. My next question, I'm going to ask
 10 it on the record and then we can go off the
 11 record when you give me your response. So
 12 I'm going to ask for your Social Security
 13 number. And we can go off the record and
 14 you can tell me that. Okay?
 15 Agree to go off the record,
 16 Gabrielle?
 17 MS. WEISS: Yes.
 18 BY MR. LUONGO:
 19 Q. So the Social?
 20 A. (Social Security was given at this
 21 time.)
 22 Q. Do you have a home telephone number
 23 or just a cell?
 24 A. I do. I don't know what it is. I

Page 8

1 don't even have a phone hooked up to it.
 2 Q. Okay. But you have a cell phone?
 3 A. Yes.
 4 Q. And what is your cell phone number?
 5 A. (484) 338-3361.
 6 Q. Is your current home address 236
 7 East Elm Street, Reading, PA 19607?
 8 A. Yes. Except not -- I don't use
 9 Reading. I use Shillington, because there
 10 is an Elm Street in the City of Reading,
 11 and Shillington is a borough.
 12 Q. Okay. Just to make sure that we
 13 have it accurate on the transcript, can you
 14 state your current address?
 15 A. 236 East Elm Street, Shillington,
 16 Pennsylvania 19607.
 17 Q. How long have you lived at that
 18 address?
 19 A. Since 2021.
 20 Q. Does October of 2021 sound right to
 21 you?
 22 A. 2022, actually. I believe I was
 23 incorrect about '21. I don't know. I
 24 can't remember which year it was.

Page 9

1 Q. Some time between 2021 and 2022?
 2 A. Yeah. It was -- it was 2022. Yes,
 3 for sure.
 4 Q. Is that a house or an apartment?
 5 A. Yeah, it's a house.
 6 Q. Do you own that property or rent?
 7 A. Own.
 8 Q. Where did you live prior to moving
 9 to your current location?
 10 A. I lived at my father's house for a
 11 short amount of time.
 12 Q. What was the address of that
 13 location?
 14 A. 3313 Fairfield Street, Laureldale,
 15 Pennsylvania 19605.
 16 Q. Did you previously have an address
 17 at 117 Colonial Drive?
 18 A. Yes. That's where my last address
 19 with John was located.
 20 Q. And you are referring to John
 21 Evanoff, correct?
 22 A. Yes.
 23 Q. So give me the full address for that
 24 property.

3 (Pages 6 to 9)

Page 10

1 A. That was 117 A Colonial Drive,
 2 Shillington, Pennsylvania 19607.
 3 Q. Was that an apartment?
 4 A. Yes.
 5 Q. And you rented that apartment?
 6 A. He -- it was in his name. But, yes.
 7 Q. An apartment rented in John
 8 Evanoff's name, correct?
 9 A. Yes. I was the resident. He was
 10 the leaseholder.
 11 Q. Okay. And how long did you live at
 12 that location?
 13 A. Approximately two years, I believe.
 14 Q. And do you recall when you moved
 15 from that property to 3313 Fairfield
 16 Street?
 17 A. I don't remember the exact month. I
 18 believe it was April of 2021.
 19 Q. And if you were there for two years,
 20 does that mean that you would have moved in
 21 sometime in 2019?
 22 A. Yes.
 23 Q. At your current location at 236 East
 24 Elm Street, who else lives at that address?

Page 11

1 A. My elderly father lives with myself
 2 and my two children, as well as my
 3 daughter's father temporarily.
 4 Q. Has your mother passed away?
 5 A. Yes.
 6 Q. The address that you mentioned, 3313
 7 Fairfield Street, that was a property that
 8 your father owned?
 9 A. Yes.
 10 Q. And did he sell that property?
 11 A. Yes.
 12 Q. Are you the sole owner of your house
 13 or do others have an ownership interest in
 14 the house?
 15 A. My daughter's father has ownership
 16 interest in the house.
 17 Q. What is your daughter's father's
 18 name?
 19 A. Andrew L. Deblasi.
 20 Q. What is your relationship to him?
 21 A. We are not together.
 22 Q. Did you say that he currently lives
 23 in your house?
 24 A. He does.

Page 12

1 Q. So what do you mean by, "we are not
 2 together"?
 3 A. We are not -- we are not seeing each
 4 other. We just live together as roommates
 5 and co-parents.
 6 Q. When did you meet Mr. Deblasi?
 7 A. We are childhood friends.
 8 Q. What is your daughter's name?
 9 A. I [REDACTED].
 10 Q. How old is your daughter?
 11 A. She is going to be 2 on
 12 [REDACTED].
 13 Q. Did you at some time form a
 14 relationship with Mr. Deblasi after March
 15 of 2021?
 16 A. Yes.
 17 Q. And how long were you in a
 18 relationship with Mr. Deblasi?
 19 A. From June of 2021 until December of
 20 2022.
 21 Q. Are you in a relationship with
 22 anyone else currently?
 23 A. No.
 24 Q. Do you have any plans to move in the

Page 13

1 next year?
 2 A. No.
 3 Q. You also stated that your son lives
 4 at your current residence, correct?
 5 A. Yes.
 6 Q. And that is G [REDACTED] [REDACTED]?
 7 A. Yes.
 8 Q. And G [REDACTED] is the son of you and
 9 John Evanoff, correct?
 10 A. Yes.
 11 Q. When was G [REDACTED] born?
 12 A. G [REDACTED] was born [REDACTED] 2015.
 13 Q. When did you meet John Evanoff?
 14 A. We were high school sweethearts. So
 15 I believe I was 16. I'm not sure what year
 16 that was. I want to say 2010. Yes,
 17 because it was a month after my mom passed.
 18 Yeah, 2010.
 19 Q. You were about 16 or 17 at that
 20 time?
 21 A. Yes. I was going to be 17 shortly
 22 after John and I started dating, which was
 23 in July of 2010. I turned 17 that August.
 24 Q. And you were married on July 14,

4 (Pages 10 to 13)

Page 14

1 2012?
 2 A. Yes.
 3 Q. What is your highest level of
 4 education?
 5 A. Some college at community college.
 6 Q. Where did you attend high school?
 7 A. Muhlenberg High School.
 8 Q. Did John Evanoff also graduate from
 9 Muhlenberg High School?
 10 A. Yes. He was two grades above me.
 11 So he graduated in 2009.
 12 Q. And you graduated in 2011?
 13 A. I was meant to. I graduated in
 14 2012.
 15 Q. How many years or semesters did you
 16 attend community college?
 17 A. Four semesters. So two years.
 18 Q. And in what years did you attend
 19 community college?
 20 A. That would have been -- I took a
 21 year off after I graduated high school, and
 22 then I did the two years. So 2013 to 2015,
 23 I believe that would have been.
 24 Q. Did you have any other training or

Page 15

1 education related to work or employment?
 2 A. No.
 3 Q. Are you currently employed?
 4 A. No.
 5 Q. Have you ever been employed?
 6 A. Yes.
 7 Q. What was your job and where were you
 8 employed?
 9 A. My last job?
 10 Q. We can work our way back. So we'll
 11 start with your last job.
 12 A. My last job was at Merry Maids. I
 13 was just a regular maid.
 14 Q. When did you have that job?
 15 A. I don't remember when I started. I
 16 ended, or resigned, I should say, the week
 17 that the accident occurred.
 18 Q. And are you referring to the
 19 March 6th, 2021, accident, involving John
 20 Evanoff?
 21 A. Yes.
 22 Q. So you have not been employed since
 23 March 2021?
 24 A. No.

Page 16

1 Q. And just to be clear for the
 2 transcript, when you say no, you are
 3 agreeing that you have not been employed
 4 since that date, right? I'm sorry. I
 5 didn't hear that.
 6 A. Correct.
 7 Q. Thank you. And prior to Merry
 8 Maids, what jobs did you hold?
 9 A. Before Merry Maids, I worked at --
 10 I'm trying to think in chronological order
 11 -- Supportive Concepts for Families, which
 12 is a nonprofit organization which takes
 13 care of mentally handicapped individuals.
 14 And then before that, I worked in a factory
 15 for a very short amount of time packing
 16 pretzels. I think that factory was called
 17 Savor Street Foods. Right before I worked
 18 there, I worked at -- I'm not certain if
 19 Zerbe Sisters Community Living, which is a
 20 nursing home, was before the factory or
 21 after the factory. I cannot remember. I
 22 do not recall. But I did work in another
 23 nursing home at some point. And I also
 24 worked at GameStop. And then my very first

Page 17

1 job was in a nursing home in the kitchen.
 2 And that was called Rittenhouse Senior
 3 Living.
 4 Q. Where was Rittenhouse Senior Living?
 5 What town?
 6 A. When did I work there?
 7 Q. No. I was asking what town it's
 8 located in.
 9 A. Reading, I believe. It may be
 10 listed as Laureldale, even.
 11 Q. Where were you born?
 12 A. Reading, Pennsylvania, at the
 13 Reading Hospital.
 14 Q. And have you lived in the Reading
 15 area your whole life?
 16 A. Yes. I attended Muhlenberg School
 17 District my entire life. I lived in one
 18 house. My parents were always together.
 19 Q. Is that one house the property you
 20 mentioned earlier that was, I believe,
 21 3313?
 22 A. Yes.
 23 Q. Do you know what your salary or
 24 hourly wage was at Merry Maids?

5 (Pages 14 to 17)

Page 18

1 A. It was a sliding pay scale. So I
2 started at \$11 for the first month, but
3 then it was based on how well you were
4 cleaning, your ratings. So after the first
5 month, I made \$14 an hour until I stepped
6 down to be part time. I do not recall when
7 I stepped down to be part time.

8 John and I had plans for me to be a
9 stay-at-home mom when he started working at
10 Deka. So we wanted to test out if we could
11 do it financially first. So then I stepped
12 down to part time, and then I went back
13 down to \$11 an hour from \$14. And then I
14 stayed at the \$11 an hour until I resigned.

15 Q. And you were working at Merry Maids
16 from December through March -- December of
17 2020 through March of '21 when John was
18 employed at Deka?

19 A. I believe so, yes.

20 Q. And Deka, that's another name for
21 East Penn Manufacturing Company, correct?

22 A. Correct.

23 Q. John Evanoff started employment at
24 East Penn Manufacturing Company in December

Page 19

1 of 2020, correct?

2 A. That sounds to be correct. I don't
3 know for sure. But approximately, yes.

4 Q. What did he do for employment prior
5 to working at East Penn?

6 A. He took care of mentally handicapped
7 individuals. I know for a short amount of
8 time, it was for a for-profit organization.
9 I do not remember the name of that
10 organization. I think he was only with
11 that one for six months.

12 For, I want to say, maybe
13 approximately four years before that, he
14 worked for Supportive Concepts for
15 Families, which is a nonprofit
16 organization, as a community home
17 supervisor taking care of mentally
18 handicapped individuals.

19 Q. Did John Evanoff have any education
20 beyond high school?

21 A. Yes. For a short amount of time, he
22 went to Reading Area Community College,
23 only a few semesters.

24 Q. You said, was it Reading Area

Page 20

1 Community College?

2 A. Yes.

3 Q. Is that the same community college
4 that you attended?

5 A. Yes.

6 Q. Did you attend at the same time or
7 at different times?

8 A. Different times.

9 Q. How did John Evanoff come to be
10 employed at East Penn?

11 A. How did he hear about it?

12 Q. Yes.

13 A. Through a friend of ours. He just
14 mentioned they were hiring. So John
15 applied and interviewed with them and was
16 hired.

17 Q. Is that friend someone that's
18 employed at East Penn?

19 A. He's no longer employed at East
20 Penn.

21 Q. Was he employed at the time?

22 A. Yes.

23 Q. What is his name or her name?

24 A. I do not recall. He wasn't my

Page 21

1 friend.

2 Q. What are your current daily
3 activities?

4 A. As far as what do I do at home?

5 Q. You said that you are not currently
6 employed. So what activities take up the
7 majority of your day?

8 A. I'm a stay-at-home mom. I cook. I
9 clean. I run errands, paying bills,
10 grocery shopping, taking G [REDACTED] to and
11 from school, doctor's appointments. Being
12 a mom.

13 Q. Is your daughter attending any type
14 of pre-school yet?

15 A. No. She's too little.

16 Q. Have your daily activities around
17 the house changed at all between now and
18 2020?

19 A. As far as is it more difficult for
20 myself?

21 Q. Well, the types of activities that
22 you do, have they changed at all?

23 A. Yes. As far as I used to not have
24 to take out the trash or carry the laundry

6 (Pages 18 to 21)

Page 22

1 basket, things -- like the smaller things.
 2 I used to not have to pay the bills. But I
 3 didn't live in this home then, so it was a
 4 little bit different. There's much more
 5 responsibility in a home than there is in
 6 an apartment. So I have many more
 7 responsibilities now than I used to.
 8 Q. Does Mr. Deblasi help at all with
 9 activities or household chores?
 10 A. No.
 11 Q. Is there a reason why not?
 12 A. He's not here most of the time.
 13 Q. Go ahead.
 14 A. He just sleeps here, really.
 15 Q. Do you have a mortgage on the house?
 16 A. Yes.
 17 Q. Does Mr. Deblasi pay towards the
 18 mortgage?
 19 A. No.
 20 Q. Is Mr. Deblasi working?
 21 A. Yes.
 22 Q. What does he do for employment?
 23 A. I'm not certain of his job title.
 24 He works for Keurig Dr. Pepper.

Page 24

1 A. I'm not certain, no.
 2 Q. And what about the house that you
 3 are currently living in, how many bedrooms,
 4 bathrooms and size?
 5 A. It's a four-bedroom, one and a half
 6 bath home. It has a living room, dining
 7 room, kitchen, mudroom. That's it. I
 8 don't know square footage.
 9 Q. Does anyone else in your current
 10 residence assist with household chores?
 11 A. No. My dad will sometimes do the
 12 dishes. He does his own laundry. But he
 13 doesn't help me with my children or
 14 anything like that. I do all the cooking,
 15 cleaning, all of those things. My father
 16 is elderly.
 17 Q. Does your father make any financial
 18 contributions to you?
 19 A. No.
 20 Q. Is he receiving Social Security?
 21 A. Yes. But he keeps that for himself.
 22 Q. What are your current sources of
 23 income?
 24 A. My current -- that would be I get

Page 23

1 Q. Who else did you say owns your
 2 house?
 3 A. Just myself and Mr. Deblasi.
 4 Q. So he's on the mortgage, but he's
 5 not paying towards the mortgage?
 6 A. Correct. He has never paid towards
 7 the mortgage.
 8 Q. Is that something you asked to do
 9 and he declined?
 10 A. No. He most of the time has not
 11 lived here.
 12 Q. Approximately how large was the
 13 apartment that you had with John Evanoff in
 14 2020?
 15 A. As far as square foot?
 16 Q. Well, first just describe it
 17 generally. Was it a one-bedroom or a
 18 studio?
 19 A. No. It was a two-bedroom apartment.
 20 It had a living room, a dining room, a
 21 kitchen, a hallway, two bedrooms, a full
 22 bathroom and a half bath.
 23 Q. And do you know approximately what
 24 the square footage was?

Page 25

1 approximately \$613 for workers'
 2 compensation from Sedgwick, and then I get
 3 Social Security, approximately \$1,700 a
 4 month in Social Security, one of the
 5 checks, and then another one for \$1,700.
 6 So \$3,200 in Social Security and then \$613
 7 for workers' compensation.
 8 Q. Do you know why you get two Social
 9 Security checks?
 10 A. One of their survivor benefits. So
 11 one of them is until G [REDACTED] is until 16.
 12 He was 5 when the incident occurred. So
 13 one of them is more so because he was so
 14 young, I believe, so that one is for --
 15 more for me. And then the other one is
 16 until he graduates -- until he's 18 or
 17 graduates high school.
 18 Q. Are you saying that both of those
 19 Social Security checks are expected to end
 20 when G [REDACTED] is at age 16 and 18?
 21 A. One of them ends when he is 16, one
 22 of them ends when he is 18. So I will not
 23 be receiving any Social Security at all by
 24 the age of 18, his age of 18.

7 (Pages 22 to 25)

Page 26

1 Q. I'm going to switch topics slightly.
 2 Have you ever given a deposition before?
 3 A. No. I've never done anything legal
 4 before.
 5 Q. This action that brings us here
 6 today is the first lawsuit that you've been
 7 involved with. Is that correct?
 8 A. As far as like getting in trouble
 9 and things like that?
 10 Q. Well, either ones that you filed or
 11 ones that you've been named in. Have you
 12 been involved in any other lawsuit?
 13 A. I'm not certain if it counts.
 14 Sedgwick was late paying my checks before,
 15 so I pursued something with that. But
 16 other than that, I've never had any kind of
 17 lawsuits other than this.
 18 Q. And when you were referring to
 19 Sedgwick being late paying checks, are you
 20 referring to workers' compensation in
 21 connection with John Evanoff?
 22 A. Yes. They were inconsistent.
 23 Q. We'll get into that later. Did you
 24 do anything to prepare for today's

Page 27

1 deposition?
 2 A. I spoke with my lawyers.
 3 Q. Did you review any documents in
 4 preparation for today's deposition?
 5 A. No.
 6 Q. Have you seen any of the deposition
 7 transcripts that were taken in this case?
 8 A. I don't understand what you mean.
 9 Q. So for this deposition, as an
 10 example, the court reporter is writing down
 11 everything that we say, and that will be
 12 produced as part of a written transcript.
 13 There have been other depositions taken in
 14 this case. For instance, one was taken of
 15 an employee of East Penn. And I was asking
 16 if you have read any of those transcripts?
 17 A. No.
 18 Q. Did you bring any documents to this
 19 deposition?
 20 A. No.
 21 Q. Going back to responsibilities
 22 around the house. Did you cook at the
 23 prior address that you had with John
 24 Evanoff?

Page 28

1 A. Did I cook?
 2 Q. Did you cook most of the meals when
 3 you were living at the prior address with
 4 John Evanoff?
 5 A. Yes. Not most of them. We shared
 6 house duties. So he would cook sometimes.
 7 I would cook sometimes. He would clean if
 8 I was at work, things like that. We were
 9 equals in the home. It just depended on
 10 who worked, who was home. Whatever needed
 11 to be done, we worked together as a team to
 12 get done.
 13 Q. Does anyone assist you with watching
 14 over your children today?
 15 A. Typically, no. Today my best friend
 16 was able to come watch my toddler. My son
 17 is at school.
 18 Q. Is he in second grade?
 19 A. He's in third.
 20 Q. Does your father assist at all with
 21 babysitting?
 22 A. No. He's 74. He wouldn't be able
 23 to pick up I [REDACTED].
 24 Q. And what about Mr. Deblasi?

Page 29

1 A. No.
 2 Q. I'm pulling up a document. It will
 3 be marked as an exhibit. Ms. Evanoff, I'm
 4 showing you a document which we'll mark as
 5 Exhibit Evanoff-1.
 6 A. Okay.
 7 Q. Take a moment to review this first
 8 page, and then I'll go to the next page.
 9 Let me know when you are ready.
 10 MS. WEISS: Can you see this
 11 okay, Victoria?
 12 THE WITNESS: It's a
 13 little -- I'm on my phone, so it's a
 14 little bit difficult.
 15 MS. WEISS: Can we zoom in on
 16 it?
 17 BY MR. LUONGO:
 18 Q. I can try to zoom in. I'll ask you
 19 some specific questions about this.
 20 A. Okay.
 21 Q. So on the second page, which I'm
 22 scrolling to now, it has a signature at the
 23 bottom left.
 24 A. Yes.

8 (Pages 26 to 29)

Page 30

1 Q. Above the line for
2 dependent/guardian/personal
3 representative's signature, is that your
4 signature?
5 A. Yes.
6 Q. And then going back to the first
7 page of this document, which has a Bates
8 stamp of East Penn 405, it has a title,
9 Agreement For Compensation For Death. Do
10 you see that?
11 A. Yes.
12 Q. And it refers to an injury date of
13 March 3rd -- excuse me, March 6th, 2021.
14 Do you see that?
15 A. Yes.
16 Q. And that relates to the accident
17 involving John Evanoff, correct?
18 A. Yes.
19 Q. On the second page, it states a
20 weekly rate of \$613.76. Do you see that?
21 A. Yes.
22 Q. And is that the workers'
23 compensation payment that you are currently
24 receiving?

Page 32

1 Q. Did you engage counsel in connection
2 with a workers' compensation claim relating
3 to John Evanoff?
4 A. As far as did I have a lawyer?
5 Q. Yes.
6 A. Yes.
7 Q. Who was that lawyer?
8 A. The initial lawyer that I used for
9 setting up benefits, his name is John
10 Koucher, Kucher.
11 Q. Okay.
12 A. I did not contact him. John's
13 sisters did that for me. And then I spoke
14 with him. So it was all...
15 Q. Were you introduced to him before
16 the workers' compensation payments started
17 to be made?
18 A. Do you mean did I speak to him as
19 far as setting up the benefits and things
20 of that nature before I started receiving
21 them?
22 Q. I am just trying to determine the
23 sequence. Did you start receiving benefits
24 before meeting with this attorney or did

Page 31

1 A. Yes.
2 Q. You mentioned before that there was
3 some inconsistency in the payments. Can
4 you tell me a little bit more about that?
5 A. Yes. So I don't remember the exact
6 months that it was occurring or weeks that
7 it was occurring. But several times, they
8 had missed payments or they were late or
9 they were on the wrong day. And this
10 happened several times since I have been
11 receiving them. So, yeah.
12 Q. Are they currently -- I'm sorry.
13 Were you finished?
14 A. Yes.
15 Q. Are they currently making these
16 payments on schedule?
17 A. Yes. Now they are.
18 Q. And have they paid you for any
19 previous missed checks?
20 A. Not recently. But they have done
21 that before.
22 Q. In other words, are they up to date
23 and current with the payments?
24 A. Yes.

Page 33

1 you meet with him after --
2 A. He set the benefits up.
3 Q. I see.
4 A. Yeah. I didn't know how to go
5 through the paperwork and all of those
6 things.
7 Q. And did this attorney assist you in
8 making a claim against East Penn when
9 payments were not being made on schedule?
10 A. Yes. He is one of, yes.
11 Q. You said, "one of." Were there
12 other attorneys that assisted you relating
13 to a workers' compensation claim against
14 East Penn?
15 A. Gabrielle.
16 Q. You are referring to your attorney
17 here today, Gabrielle Weiss?
18 A. Yes. When they were late. She did
19 not assist in setting them up, though.
20 Q. And when they were late with
21 payments, how was that resolved? Was there
22 an agreement of any type?
23 A. I don't remember what the -- what
24 the thing was called legally. I just know

9 (Pages 30 to 33)

Page 34

1 that I had a meeting, and after the
 2 meeting, they started paying on time.
 3 Q. Do you know how --
 4 A. I am not good --
 5 Q. Go ahead.
 6 A. I'm not good with the technical
 7 legal names of different meetings and
 8 things like that.
 9 Q. Understood. And I'm only asking for
 10 what's within your knowledge.
 11 A. Yeah.
 12 Q. Do you know how the rate of
 13 approximately -- let me rephrase that.
 14 Do you know how the rate of \$613.76
 15 was determined?
 16 A. I don't know the technicalities. I
 17 know it has something to do with John's pay
 18 rate.
 19 Q. Do you use any social media
 20 platforms?
 21 A. Yes.
 22 Q. Which ones do you use?
 23 A. I use Facebook, Snapchat, Tiktok,
 24 the normal ones that everybody uses.

Page 36

1 A. No. My mother passed away when I
 2 was 16. So it's John. Any time that I say
 3 grandmother, that would be John's mother.
 4 Q. Understood. Do you still maintain
 5 contact with John Evanoff's parents?
 6 A. John did not have a father. But,
 7 yes, I still speak with Rose, his mother.
 8 Q. I'm sorry. What was the last part?
 9 A. G [REDACTED] still goes to visit her and
 10 things like that. So I do still speak with
 11 her.
 12 Q. Do you have any type of relationship
 13 with John Evanoff's sisters?
 14 A. Yes. They live in Ohio, so I don't
 15 typically get to see them in person. But
 16 we do still speak to each other, yes.
 17 Q. How did John Evanoff help around the
 18 house?
 19 A. He would -- we shared parenting
 20 responsibilities. He loved G [REDACTED]. So he
 21 was all about being around G [REDACTED] all the
 22 time. That wasn't like -- we just would
 23 both take care of G [REDACTED]. And then, like
 24 I said, depending on if I was at work or he

Page 35

1 Q. Do you have an Instagram?
 2 A. Not anymore.
 3 Q. We've been going for almost an hour.
 4 Are you comfortable to continue, or do you
 5 want to take a short break?
 6 A. I'm okay continuing.
 7 Q. What types of activities did John
 8 Evanoff do prior to the March 2021 accident
 9 in terms of personal life?
 10 A. As far as in the home or like what
 11 was he interested in?
 12 Q. I'll go through it. So did he have
 13 any hobbies?
 14 A. Yes. John liked to play video
 15 games, watch movies, like go to the movies.
 16 We would go shopping, hang out with his
 17 friends, go on vacations, out to dinners.
 18 We were a family unit. So typically it
 19 wasn't just John. It was almost always
 20 like John, me and G [REDACTED], unless G [REDACTED]
 21 was with his grandmother.
 22 Q. When you say, "grandmother," are you
 23 referring to your mother or John Evanoff's
 24 mother?

Page 37

1 was at work, it would just depend on who
 2 cooked, who cleaned. Whatever needed to be
 3 done, we would share responsibilities as
 4 far as that was. I did most of the
 5 cleaning, but he would definitely help. He
 6 would help do laundry. He always took out
 7 the trash. I didn't really take out the
 8 trash. Everything was pretty equal. He
 9 mostly did trash by himself. Otherwise, we
 10 shared responsibilities depending on when
 11 and what was going on working-wise.
 12 Q. Was the video games something that
 13 John did on his own, or was that an
 14 interest that you also had?
 15 A. I love video games, too, so does my
 16 son. We would all play video games
 17 together.
 18 Q. Was John Evanoff diagnosed with any
 19 medical conditions prior to March 2021?
 20 A. He was diagnosed with ADHD. He
 21 wasn't taking any medication for it,
 22 though. He didn't need it. He always
 23 functioned without any medications.
 24 Q. When was he diagnosed with ADHD?

10 (Pages 34 to 37)

Page 38

1 A. He was probably a child, I would
 2 imagine. I know in school, he had to take
 3 medication for it. But after school, he
 4 stopped taking the medication and he was
 5 fine functioning at work and in the home
 6 without medication. So he didn't take any.
 7 Q. Did he have any other health
 8 conditions or limitations of any type?
 9 A. No.
 10 Q. Did he have a primary care doctor?
 11 A. Yes. I do not know the name of his
 12 doctor. I don't even remember where he
 13 went to the doctor.
 14 Q. Had he ever been hospitalized prior
 15 to March 2021?
 16 A. I do not recall. As far as severe
 17 injuries, I don't remember him having any
 18 severe injuries or anything like that.
 19 Q. What about minor injuries?
 20 A. Like what do you mean?
 21 Q. It could be anything. A broken
 22 bone, a car accident?
 23 A. No broken bones. We were in a car
 24 accident, but I think all he did was just

Page 40

1 even a year old, I don't think.
 2 Q. Was it totaled?
 3 A. Yes.
 4 Q. Did John Evanoff have any medical
 5 treatment in connection with that car
 6 accident?
 7 A. I don't remember if he saw a doctor
 8 for anything related to that. He was more
 9 concerned with if I was okay, because I was
 10 in a lot of pain.
 11 Q. Did you go to the hospital after
 12 that accident?
 13 A. I may have seen -- I don't remember
 14 if I did. I may have just seen my doctor
 15 that delivered my son. Like I said, I had
 16 a caesarean. So that was my -- the seat
 17 belt hurt. But other than that, I don't
 18 think -- I don't remember if I went to like
 19 a Patient First or anything like that. I
 20 may have only seen like my follow-up --
 21 like I just had my son. So I can't recall.
 22 Q. And just to make sure I understand
 23 your testimony correctly, you had just
 24 given birth to G [REDACTED], and then shortly

Page 39

1 sprain -- I don't even remember what he
 2 sprained. He just sprained something and
 3 it was fine in like a month.
 4 Q. When was that car accident?
 5 A. Oh, boy. I do not recall. It was
 6 very long before he worked at the factory.
 7 I know that. Like it -- yeah, I can't even
 8 tell you a year.
 9 Q. What happened in that car accident?
 10 Were you with him at the time?
 11 A. Yes. Oh, I do know the year,
 12 because I had just had G [REDACTED] by
 13 caesarean. It was a week, the same week
 14 that I had G [REDACTED], because I was concerned
 15 about my incision. I remember that. So it
 16 would have been in [REDACTED] 2015.
 17 We were stopped at a stoplight in
 18 Muhlenberg and we were rear-ended. I got
 19 hurt. He was fine.
 20 Q. What type of vehicle were you in?
 21 A. It was -- I don't remember the year
 22 of it. It was a Chevy Sonic.
 23 Q. Is that a sedan?
 24 A. Yes. We just got it. It wasn't

Page 41

1 after, this accident occurred?
 2 A. It was in the same week that I had
 3 given birth to G [REDACTED], yes.
 4 Q. Was it just you and John Evanoff in
 5 the vehicle at the time of the accident?
 6 A. Yes. G [REDACTED] was in the NICU for
 7 five months after he was born. He was a
 8 micro preemie. He was born at six months
 9 gestation, approximately, 26 weeks and some
 10 days. His sister was also born premature.
 11 Q. You are referring to your daughter?
 12 A. Yes.
 13 Q. Was John Evanoff wearing a seat belt
 14 at the time of that accident?
 15 A. Yes. He always -- we both always
 16 wore our seat belts. Safety is very
 17 important.
 18 Q. Was John Evanoff a smoker?
 19 A. Yes.
 20 Q. Cigarettes?
 21 A. Yes.
 22 Q. Anything else?
 23 A. No.
 24 Q. Well, it could be cigars or

11 (Pages 38 to 41)

Page 42

1 something like that.
 2 A. No.
 3 Q. Just cigarettes?
 4 A. Yes.
 5 Q. And how many cigarettes a day would
 6 he smoke on average?
 7 A. Approximately maybe ten.
 8 Q. So about half a pack of cigarettes a
 9 day?
 10 A. Yes.
 11 Q. Do you smoke?
 12 A. Not anymore.
 13 Q. When did you quit?
 14 A. I don't know. I don't have an exact
 15 date. It's been a while.
 16 Q. Was John Evanoff always a smoker
 17 from the time that you met in high school
 18 through March of 2021?
 19 A. Yes.
 20 Q. Did John Evanoff drink any alcohol?
 21 A. Very rarely.
 22 Q. Can you estimate the number of
 23 drinks a week on average?
 24 A. It wasn't weekly.

Page 44

1 weighed when. Yeah, I'm not certain. John
 2 was always a large man. He was what I
 3 call -- I call lovingly a manly man. He
 4 was just a big guy, to me. I'm small.
 5 Q. Do you feel like he gained weight
 6 over the time that you met him or was he
 7 always a large man, as you describe him?
 8 A. Yeah. Because I met him when he was
 9 19, and then he became a grown man as I was
 10 with him. We were together a very long
 11 time. Well, to me what is a long time.
 12 Q. Would it be fair to say that maybe
 13 the 2015 to 2021 time period, he was
 14 approximately 230 to 240 pounds?
 15 A. Yes.
 16 Q. Did he have any doctors other than a
 17 primary care physician?
 18 A. A dentist. But I don't remember
 19 where or who that was either. It was a
 20 small business.
 21 Q. Did he have any hospitalizations
 22 that you can recall?
 23 A. Like admissions?
 24 Q. Going to the hospital for any

Page 43

1 Q. Any drug use?
 2 A. No, no.
 3 Q. What about prescription medications?
 4 Was John Evanoff prescribed any
 5 medications?
 6 A. Not that I recall. I don't remember
 7 him taking anything daily. Not even -- I
 8 don't think he even -- no, not even -- no.
 9 He didn't even take supplements for him
 10 working out.
 11 Q. You mentioned working out. Did he
 12 go to the gym? What are you referring to?
 13 A. He didn't go to a gym. But he would
 14 do like, you know, pushups or just little
 15 things to try to stay healthy.
 16 Q. Do you know what his height and
 17 weight were?
 18 A. He was 6'1". His weight would
 19 fluctuate, give or take 10 pounds. I think
 20 he was around maybe 240 pounds.
 21 Q. And was he in that weight range for
 22 approximately how long prior to 2021?
 23 A. I don't really remember. I was with
 24 him for so long, it's blurry how much he

Page 45

1 reason.
 2 A. I don't remember him being -- having
 3 any hospital stays or anything like that,
 4 no.
 5 Q. Do you recall any surgeries that he
 6 may have had?
 7 A. No.
 8 Q. Did he have any -- was he involved
 9 in any accidents other than that motor
 10 vehicle accident you described earlier?
 11 A. No.
 12 Q. So we talked earlier that John
 13 Evanoff began work at East Penn in or
 14 around December of 2020. At the time when
 15 he was there, did he say anything to you
 16 about his intentions to continue working at
 17 the company or maybe a desire to change
 18 jobs or go back to what he was doing
 19 before?
 20 A. No. He was very excited to work
 21 there. The pay rate was much higher than
 22 his previous job. So he was very happy
 23 that he was going to be making more money.
 24 Q. Did he have any other claims related

12 (Pages 42 to 45)

Page 46

1 to work injuries prior to March 2021?
 2 A. Claims? I'm not certain. I know he
 3 had gotten burnt on his cheek. But I don't
 4 know if the nurse filed any -- he went to
 5 see the nurse about that. But I don't know
 6 if they filed any paperwork on it. I'm not
 7 certain.
 8 Q. When you say that he had gotten
 9 burnt on his cheek, was that while working
 10 at East Penn?
 11 A. Yes.
 12 Q. And when you said he went to see a
 13 nurse, would that be a nurse working at
 14 East Penn?
 15 A. Yes.
 16 Q. What was the extent of the burn?
 17 A. It was maybe like -- maybe an inch
 18 long on his cheek here.
 19 Q. Okay. And you are pointing to your
 20 right cheek?
 21 A. I don't remember which cheek. It
 22 was near his eye-ish on his cheekbone area.
 23 Hot lead had splashed up on his face.
 24 Q. Did he say anything to you about how

Page 47

1 that incident occurred?
 2 A. He said that there was lead stuck to
 3 something and when it detached and fell
 4 into the molten lead, then there was
 5 splash-up. I don't know exactly how
 6 everything works as far as that goes, but
 7 that's how he explained it to me.
 8 Q. Did he describe his daily work
 9 activities to you?
 10 A. Yes. Not in great detail. But I
 11 kind of knew what he did in general, if
 12 that's what you mean.
 13 Q. Did he discuss any type of training
 14 that he may have received at East Penn?
 15 A. I know he -- I don't know the
 16 specifics of the training. I don't think
 17 he was like -- I know he drove the
 18 forklift, but he wasn't -- they didn't yet
 19 give him the certification for it. But he
 20 was required to drive it. They made him
 21 drive it. So I know he did that. He only
 22 just finished training, I think, when the
 23 accident occurred, shortly before that. He
 24 still worked -- his partner that he worked

Page 48

1 with was his trainer as well. But for the
 2 most part, I think he -- I don't know
 3 about, like, certifications or anything
 4 like that. But he was trained to do the
 5 job that he was doing.
 6 Q. And that training was provided by
 7 East Penn?
 8 A. Yes.
 9 Q. You mentioned a partner that he
 10 worked with. Who were you referring to?
 11 A. I don't know the man's name. I
 12 just -- well, I know his first name was
 13 Josh. I don't know anything else.
 14 Q. Have you spoken with anyone at East
 15 Penn since the March 2021 incident?
 16 A. As far as do you mean like -- well,
 17 the night of the incident, I had spoken to
 18 somebody when I called them to see if it
 19 was John that was involved in the accident.
 20 But other than that, no. And for his
 21 memorial, a woman had reached out from HR,
 22 I believe. But other than that, no. I
 23 always went through my lawyers.
 24 Q. How did you come to learn of the

Page 49

1 incident?
 2 A. I was asleep on the couch waiting
 3 for him to come home. We were going to
 4 watch a movie together. G[REDACTED] was at his
 5 grandmother's. Can I have just a moment,
 6 please?
 7 Q. Yes. We will go off the record.
 8 (A brief recess was taken at
 9 this time.)
 10 BY MR. LUONGO:
 11 Q. We're back on.
 12 A. I was asleep on the couch, and then
 13 I woke up to a message from my nephew on
 14 Facebook stating that there had been an
 15 accident at East Penn Manufacturing. And
 16 he wanted to know if John knew anything
 17 about it, because it was in the smelting
 18 building. And then I realized that John
 19 wasn't home, so I called them.
 20 It was like 2:30 in the morning or
 21 something when I received the message. So
 22 I called them to see where John was and if
 23 he was still in the building. I thought
 24 maybe he had been held up because of, you

13 (Pages 46 to 49)

Page 50

1 know, something happening in his building.
2 Of course maybe they had to like traffic,
3 or if there was an accident, maybe he had
4 gotten hurt. I didn't know exactly what
5 the accident was.

6 So I called them. And then I don't
7 know how many people I spoke to. I know it
8 was back and forth, and it was a mess. But
9 I did speak to some people that night.
10 They didn't actually -- they just said that
11 he was involved in an accident. They
12 didn't tell me of his death. They just
13 said some folks were going to come around
14 to talk to me. I remember that was their
15 exact wording: Some folks are going to
16 come around to talk to you then.

17 And then the coroner came to my
18 house and stuff and talked to me a few
19 hours later.

20 Q. Is that the first person to come to
21 your home regarding this, the coroner?

22 A. Yeah. They came in a coroner marked
23 vehicle.

24 Q. There was a memorial service for

Page 51

1 John Evanoff, correct?

2 A. You mean did I have a memorial
3 service or did the company have a memorial
4 service?

5 Q. Sorry. One moment. Did you have a
6 memorial service for John Evanoff?

7 A. Yes, I did.

8 Q. Is that the Theo C. Auman Funeral
9 Home in Reading, Pennsylvania?

10 A. Yes.

11 Q. Did you set up any type of GoFundMe
12 for John Evanoff? Excuse me. Let me
13 rephrase that.

14 Did you set up any GoFundMe relating
15 to your memorial service for John Evanoff?

16 A. I did not. His sisters, or sister,
17 I believe, did.

18 Q. And did you receive any funds from
19 setting that up?

20 MS. WEISS: Objection to the
21 form.

22 You can answer.

23 THE WITNESS: What's that?

24 MS. WEISS: You can answer.

Page 52

1 I just objected. But you can answer
2 the question.

3 THE WITNESS: Okay. Yes, I
4 did.

5 BY MR. LUONGO:

6 Q. I'm going to pull up another exhibit
7 that will be marked. Ms. Evanoff, I'm
8 showing you a document that will be marked
9 as Exhibit Evanoff-2. It's a screenshot of
10 a GoFundMe page set up in connection with
11 John Evanoff. Is this a photo of you, John
12 Evanoff and G [REDACTED] in this exhibit?

13 A. Yes.

14 Q. If you look to the right side,
15 there's a donation goal. Do you see that?

16 A. Yes.

17 Q. And the \$28,916, who did that go to?

18 A. Me.

19 Q. Did that cover funeral expenses?

20 A. Yes.

21 Q. And were there funds left over after
22 paying for the funeral expenses?

23 A. Yes.

24 Q. Do you have any plans to return to

Page 53

1 work?

2 A. Probably some day. Not in the near
3 future.

4 Q. When your daughter begins school,
5 have you given any thought as to whether or
6 not you would go back to work at that time?

7 A. No. Well, I haven't thought about
8 it. Not really. Maybe.

9 Q. Have you made any efforts currently
10 to look for employment?

11 A. No.

12 MS. WEISS: Do you want to
13 take a break for a few minutes,
14 Victoria?

15 THE WITNESS: Yes, please.

16 MR. LUONGO: Let's go off the
17 record.

18 (At this time, a short break
19 was taken.)

20 BY MR. LUONGO:

21 Q. I only have a few follow-up
22 questions for you.

23 Earlier in the deposition I asked
24 about social media websites, and you

14 (Pages 50 to 53)

Page 54

1 mentioned Facebook, Snapchat, Tiktok. Do
2 you have any special usernames on those
3 accounts?

4 A. First I wanted to ask, is Gabrielle
5 here?

6 MS. WEISS: I'm here.

7 THE WITNESS: Okay. I'm
8 trying to remember what they are.
9 My Facebook account is my name,
10 Victoria Evanoff. And then my
11 Tiktok account -- what's the name?
12 I don't recall what the name is.
13 It's under my name, but I don't
14 know -- I can't remember what the
15 username is. And my Snapchat also
16 shows up under my name. I don't
17 remember what the username is.

18 BY MR. LUONGO:

19 Q. Is Mr. Deblasi currently in a
20 relationship?

21 A. I'm not certain. I don't believe
22 so.

23 Q. Is he close with your daughter, his
24 daughter?

Page 55

1 A. He sees her every day since he lives
2 here and she lives here.

3 Q. Does he assist with taking care of
4 her?

5 A. Not particularly.

6 Q. Do you speak with him on a daily
7 basis?

8 A. In passing, like if we happen to be
9 in the same room.

10 Q. Did your relationship with him
11 change since the time that you bought your
12 current home? In other words, were you
13 together when you bought the house?

14 A. Yes.

15 Q. So you were in a relationship with
16 Mr. Deblasi when you purchased the home?

17 A. Yes.

18 Q. But at a later date, you split up
19 with him?

20 A. Yes.

21 Q. What is the ownership interest of
22 the house between you and Mr. Deblasi?

23 A. What do you mean?

24 Q. In terms of percentage, is it split

Page 56

1 equally or is it some other distribution?

2 A. I believe so.

3 Q. You believe that it's split equally
4 between you and Mr. Deblasi?

5 A. Legally, yes. Financially, I've
6 always paid everything.

7 Q. What is the monthly mortgage
8 payment?

9 A. Approximately \$2,100. I have
10 everything on automatic out of my bank
11 account. But I believe that's what it is.

12 Q. And then in addition to that, do you
13 pay electricity and utilities separate?

14 A. Yes. I pay -- I have water, trash,
15 sewer, and I have electric and I have gas,
16 and then the taxes are in with the
17 mortgage.

18 Q. Is this a single-family home as
19 opposed to a house that's connected to
20 other homes?

21 A. Single family.

22 Q. Is G [REDACTED] involved in any school
23 activities or after-school activities
24 today?

Page 57

1 A. Do you mean is he at school?

2 Q. Well, I understand that he's in
3 third grade. Does he do any after-school
4 activities?

5 A. No, he doesn't. He's not
6 interested. I've tried to get him in to
7 science. He's very interested in science.
8 But he doesn't attend any after-school
9 programs.

10 Q. Is he playing any sports or anything
11 of that nature?

12 A. Oh, no. G [REDACTED] doesn't like
13 contact sports. He doesn't -- he's not a
14 sporty boy. He likes more like art and
15 music. He really likes -- his favorite
16 thing he said is recess.

17 Q. What does he like about that?

18 A. Recess? He's a social butterfly.
19 He loves playing with friends.

20 Q. So does he bring friends home after
21 school?

22 A. No. He just has school friends,
23 really. He doesn't -- he doesn't have
24 anybody that comes over yet.

15 (Pages 54 to 57)

1 Q. Would you describe him as an
2 outgoing personality?

3 A. Yeah. He's very friendly. He's
4 very compassionate, a very kind boy.

5 Q. Does he help take care of his half
6 sister?

7 A. Yes. He loves -- oh, he loves her.
8 He loves her so much. They are funny.

9 Q. I am just looking over my notes to
10 see if I have anything else.

11 You mentioned the workplace incident
12 where John had a burn on his cheek. Do you
13 recall that testimony?

14 A. I do.

15 Q. Did he mention any concerns to you
16 about working at East Penn, or was he happy
17 to be there?

18 A. As far as concerns, the only concern
19 that he had was his respirator, really. He
20 did say it was like -- the area that he
21 worked in was like a really busy, bustling
22 area, I guess as far as like people moving
23 around and stuff. But he was happy to be
24 working there, so he wasn't -- he didn't

1 A. No, it was not a desk. It would
2 have been like on the floor.

3 Q. And I believe that you mentioned
4 earlier that a friend had mentioned that
5 East Penn was looking to hire. Did you
6 interview based on the person making that
7 statement to you, or was this before John
8 Evanoff applied?

9 A. It was before John applied for his
10 position, much, much before he applied. It
11 was a different person that had -- the
12 person that told me about the position that
13 I interviewed for was a totally different
14 person than who the person that told him.
15 Mine was my own friend that had told me.

16 Q. Did you ever mention East Penn to
17 John Evanoff as a potential employment
18 opportunity?

19 A. Not particularly. I mean, East Penn
20 is one of the largest factories in our
21 area, so it's kind of like common knowledge
22 that that's like one of the places to work
23 if you want to make good money. So a lot
24 of people work there in this area.

1 want to leave East Penn or anything like
2 that. But, you know, you are working with
3 hot lead. It's hot. He had mentioned that
4 it was hot in the building that he worked
5 in. He only worked there a short time, so
6 he was happy to be making more money. He
7 was happy I was going to be able to be a
8 stay-at-home mom. We were looking forward
9 to the future.

10 Q. Did you ever go to East Penn prior
11 to the March 2021 incident?

12 A. I actually had applied there before,
13 but I wasn't hired. I had been there for
14 an interview. That's it. I don't remember
15 when, though.

16 Q. What was the position that you
17 interviewed for?

18 A. I don't recall what the position
19 exactly was named as. I think it had
20 something to do probably, like, battery
21 assembly.

22 Q. Was it a position to be working on
23 the floor of the plant or some other front
24 desk type role?

1 Q. Did you and John Evanoff have a
2 social circle of friends, or did you mostly
3 spend time together between the two of you?

4 A. I don't have many friends myself.
5 We shared most of our friends. He did have
6 some friends that I didn't really know,
7 more so associates, I guess. John was very
8 popular in high school. I was more of an
9 introvert. So he had many, many, I guess
10 you could call them acquaintances more so
11 than friends. But our close-knit friends
12 circle were our friends. We were with each
13 other constantly.

14 Q. Do you still maintain contact with
15 those friends?

16 A. I don't really talk to any of the
17 friends, no, that he had then before the
18 accident. I don't, no.

19 MR. LUONGO: Thank you for
20 your time today, Ms. Evanoff. I
21 don't have any other questions.
22 I'll turn it over to your counsel if
23 she does. But I appreciate your
24 taking the time this morning. I

Page 62

1 know it was -- we had to talk about
2 some emotional issues, so I
3 appreciate that. Thank you.

4 THE WITNESS: Thank you.

5 BY MS. WEISS:

6 Q. I just have a few questions for you.
7 Do you recall today talking about whether
8 Mr. Deblasi contributed financially towards
9 the home that you currently live in?

10 A. Yes.

11 Q. Does Mr. Deblasi contribute to any
12 of the utilities, water, trash, sewer,
13 electric or gas?

14 A. No.

15 Q. Does he pay anything towards the
16 taxes on the house?

17 A. No.

18 Q. Does he pay you any type of rent?

19 A. No.

20 Q. Does he pay any type of child
21 support?

22 A. No.

23 MS. WEISS: I have no further
24 questions. Thank you, Victoria.

Page 63

1 BY MR. LUONGO:

2 Q. I have a couple follow-up. On the
3 child support, is that something that
4 you've requested him to assist with?

5 A. I did request it, yes. I did not
6 follow through.

7 Q. What was his response on
8 contributing to all these things, the
9 utilities, the taxes, rent and the child
10 support?

11 A. I didn't -- I never really asked him
12 for any money to stay here. I want him to
13 be able to save his money so that he can
14 live on his own at some point. So he's
15 just been saving money so that he can get
16 his own place separate from this home.

17 Q. I apologize if I asked this earlier.

18 But what is he currently doing for work?

19 A. I'm not certain of his job title.

20 He works in a factory, Keurig Dr. Pepper.

21 MR. LUONGO: That's right.

22 Okay. Thank you, Ms. Evanoff.

23 (Deposition concluded at
24 12:03 p.m.)

Page 64

1 (At this time, documents were
2 marked for identification as Exhibit
3 Nos. Evanoff-1 and Evanoff-2.)
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Page 65

1 CERTIFICATE

2
3 I, KRISTIN N. McCUSKER, Registered Merit
4 Reporter, Certified Realtime Reporter and Notary Public,
5 do hereby certify that the foregoing is a true and
6 accurate transcript of the stenographic notes taken by me
7 in the aforementioned matter.
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19 DATE: _____
20 Kristin N. McCusker, RPR, RMR, CRR,
Notary Public
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17 (Pages 62 to 65)